AUSA Nathalina A. Hudson 312-353-1123

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS - EASTERN DIVISION

AFFIDAVIT IN REMOVAL PROCEEDINGS
UNITED STATES OF AMERICA $D \in C_3$
KENNEDY ODURO MICHAEL W DOBRING CLERK, U.S. D. DOBRING MICHAEL W DOBRING
MICHAEL W. DOBBINS NUMBER: MAGISTRATE JUDGE BROWN NORTHERN DISTRICT OF ILLINOIS DISTRICT COURT
The undersigned Affiant personally appeared before Sidney I. Schenkier, a United States
Magistrate Judge, and being duly sworn on oath, states: that at the <u>DISTRICT OF COLORADO</u> ,
one KENNEDY ODURO, was charged with aiding and assisting in the preparation of false tax
returns in violation of Title 26, U.S.C. Section 7206 (2) and that on the basis of Affiant's
investigation and information received concerning the case through official channels, does hereby
certify that a Warrant for Arrest is outstanding for the arrest of said defendant. (See Attached -
Warrant for Arrest).
Wherefore, Affiant prays that the defendant be dealt with according to law.
Belkis Cantor Deputy, United States Marshals Service
Subscribed and Sworn to before me this 31st day of December, 2007.
Andy Itel
SIDNEY SCHENKIER
United States Magistrate Judge
AUSA Nathalina A. Hudson
Bond set [or recommended] by issuing Court at

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AO 442 (Rev 5/85) Warrant for Arrest

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	DISTRICT OF COLORADO						
UNITE	STATES OF A	MERICA					
KENNE	V. DY ODURO	,	WARRA	ANT FOR ARREST			
	: The United States Marshal 07 - C R - 00430-EWN and any Authorized United States Officer						
YOU ARE Inearest magistrate	HEREBY COMM/ to answer an	ANDED to arrest Ken	nedy Oduro, a	and bring him forthwith to the			
X Indictment Ind	formation Complain	nt D Order of Court D	Violation Notice	Probation Violation Petition			
	·	eparation of false tax	returns				
in violation of Title GREGORY C. LANG	HAM	ion 7206(2)					
Clerk, U. S. District C Name of Issuing Officer Signature of Issuing Officer	ir se ir se		Title of (ssuing Of	3-07 Denver Co			
(By) Deputy Clark			Date and Epidatical				
Bail fixed at \$		b		of Judicial Officer			
		RETURN					
This warrant was receive	ed and executed with th	e arrest of the above-named o	efendant at				
DATE RECEIVED		NAME AND TITLE OF ARRES	TING OFFICER	SIGNATURE OF ARRESTING OFFICER			
DATE OF ARREST							

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Criminal Case No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. KENNEDY ODURO,

Defendant.

INDICTMENT COUNTS 1-33 26 U.S.C. § 7206(2)

The Grand Jury charges that:

COUNTS 1-33

On or about the dates listed below, in the District of Colorado, the defendant, KENNEDY ODURO, then a resident of Colorado, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the Internal Revenue Service, of U.S. Individual Form 1040 Income Tax Returns in the taxpayer names and for the calendar years listed below, which were false and fraudulent as to material matters, in that the defendant assisted in the preparation and presentation of returns which contained the false entries listed below concerning business losses from Schedule C, itemized deductions from Schedule A, and education credits, when, as the defendant well knew,

the taxpayers listed below did not incur the reported business losses, were not entitled to the claimed deductions from Schedule A, and were not entitled to the claimed education credits:

Count	Date	Return	False Entries
1	3/15/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Ernestine N. Achi	1. Itemized deductions from Schedule A on line 37 of \$10,987 2. Education credit on line 47 of \$1,274
2	4/4/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Ernestine N. Achi	1. Itemized deductions from Schedule A on line 39 of \$14,216
3	2/23/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Eric Anni	1. Business loss from Schedule C on line 12 of \$15,692 2. Itemized deductions from Schedule A on line 37 of \$14,313 3. Education credit on line 47 of \$704
4	2/21/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Eric Anni	1. Itemized deductions from Schedule A on line 39 of \$20,997 2. Education credit on line 49 of \$1,500
5	2/23/2004	2003 U.S. Individual Income Tax Form 1040 in the name of George Ansere	1. Business loss from Schedule C on line 12 of \$3,360 2. Itemized deductions from Schedule A on line 37 of \$21,047 3. Education credit on line 47 of \$929

	<u> </u>	<u> </u>	
б	3/15/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Geletu G. Bame	1. Business loss from Schedule C on line 12 of \$10,855 2. Itemized deductions from Schedule A on line 37 of \$8,264
7	2/28/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Harouna Banse	 Itemized deductions from Schedule A on line 39 of \$19,322 Education credit on line 49 of \$1,452
8	5/3/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Mary Behre	1. Itemized deductions from Schedule A on line 37 of \$16,780
9	3/28/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Mary Behre	1. Itemized deductions from Schedule A on line 39 of \$12,496
10	4/5/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Daniel Boateng	1. Itemized deductions from Schedule A on line 37 of \$16,623 2. Education credit on line 47 of \$1,500
11	4/25/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Daniel Boateng	1. Itemized deductions from Schedule A on line 39 of \$20,377 2. Education credit on line 49 of \$1,500
12	3/29/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Kingsley Boateng	1. Itemized deductions from Schedule A on line 37 of \$15,462 2. Education credit on line 47 of \$1,469

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13	4/4/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Kingsley Boateng	1. Itemized deductions from Schedule A on line 39 of \$19,177 2. Education credit on line 49 of \$1,500
14	5/31/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Rosalia N. Chetekeyi	1. Itemized deductions from Schedule A on line 37 of \$18,070
15	5/30/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Rosalia N. Chetekeyi	1. Itemized deductions from Schedule A on line 39 of \$18,346
16	4/5/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Kwabena H. Dankwa	1. Itemized deductions from Schedule A on line 37 of \$20,832
17	5/2/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Kwabena H. Dankwa	1. Itemized deductions from Schedule A on line 39 of \$16,848 2. Education credit on line 49 of \$1,500
18	2/21/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Joshua Darko	1. Itemized deductions from Schedule A on line 39 of \$30,894
19	3/29/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Baríbeera Gbi- U	1. Itemized deductions from Schedule A on line 37 of \$16,010
20	4/25/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Baribeera Gbi- U	1. Itemized deductions from Schedule A on line 39 of \$19,408

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21 3/8/2004 2003 U.S. Individual 1. Itemized deductions from Schedule A on line 37 of Income Tax Form 1040 in the name of Lemlem Z. \$11,748 Gebremariam 2004 U.S. Individual 1. Itemized deductions from 22 3/14/2005 Schedule A on line 39 of Income Tax Form 1040 in the name of Lemlem Z. \$16,486 Gebremariam 23 2/21/2005 2004 U.S. Individual 1. Itemized deductions from Schedule A on line 39 of Income Tax Form 1040 in the name of Jessica A. \$21,857 Jantuah 2. Education credit on line 49 of \$1,500 24 3/7/2005 2004 U.S. Individual 1. Itemized deductions from Income Tax Form 1040 in Schedule A on line 39 of \$14,212 the name of Samuel Korankye 2. Education credit on line 49 of \$1,500 25 3/1/2004 2003 U.S. Individual 1. Itemized deductions from Income Tax Form 1040 in Schedule A on line 37 of the name of Francis N. \$22,424 2. Education credit on line 47 Kotey of \$1,274 26 3/22/2004 2003 U.S. Individual 1. Itemized deductions from Income Tax Form 1040 in Schedule A on line 37 of the name of Francess \$8,989 Mendy 2. Education credit on line 47 of \$1,109 27 3/22/2004 2003 U.S. Individual 1. Itemized deductions from Income Tax Form 1040 in Schedule A on line 37 of the name of Thomas O. \$19,316 Mensah 2. Education credit on line 47 of \$1,482

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28	2/28/2005	2004 U.S. Individual Income Tax Form 1040 in the name of George Oppong	1. Itemized deductions from Schedule A on line 39 of \$30,793
29	2/23/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Joseph Poakwah	1. Itemized deductions from Schedule A on line 37 of \$9,255 2. Education credit on line 47 of \$680
30	3/7/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Joseph Poakwah	1. Itemized deductions from Schedule A on line 39 of \$19,945 2. Education credit on line 49 of \$1,500
31	3/14/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Alhassan U. Saeed	1. Itemized deductions from Schedule A on line 39 of \$14,275 2. Education credit on line 49 of \$1,500
32	3/1/2004	2003 U.S. Individual Income Tax Form 1040 in the name of Eric Wilson	1. Itemized deductions from Schedule A on line 37 of \$12,583 2. Education credit on line 47 of \$623
33	4/11/2005	2004 U.S. Individual Income Tax Form 1040 in the name of Eric Wilson	1. Itemized deductions from Schedule A on line 39 of \$18,135 2. Education credit on line 49 of \$1,500

The foregoing was in violation of Title 26, United States Code, Section 7206(2).

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A TRUE BILL:

s/ Foreperson FOREPERSON

TROY A. EID UNITED STATES ATTORNEY

s/ Matthew T. Kirsch By: Matthew T. Kirsch Assistant United States Attorney United States Attorney's Office 1225 17th Street, Suite 700 Denver, Colorado 80202 Telephone: (303) 454-0100 E-mail: Matthew.Kirsch@usdoj.gov Attorney for the United States